

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-G and defendant American Medical Systems, Inc. (“AMS”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in the actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to pursue these actions against them.

Respectfully:

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Dated: June 5, 2018

EXHIBIT A – FLINT LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:17-CV-01613	Nancy Langham v. American Medical Systems, Inc., Ethicon, Inc., Johnson & Johnson

EXHIBIT B – LOWE LAW GROUP

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-19771	Patricia Z. Debose, Jeffrey W. Debose, Sr. v. American Medical Systems, Inc., Ethicon, Inc., Johnson & Johnson

EXHIBIT C – PETERSON & ASSOCIATES

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:15-CV-02850	Pamela Morrill v. American Medical Systems, Inc., Ethicon, Inc., Johnson & Johnson

EXHIBIT D – SUMMERS & JOHNSON

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-18886	Theresa Healy v. American Medical Systems, Inc., Ethicon, Inc., Johnson & Johnson

EXHIBIT E – TOR HOERMAN LAW

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:16-CV-05065	Luis Ann Hyatt, William Hyatt v. American Medical Systems, Inc., Ethicon, Inc., Johnson & Johnson

EXHIBIT F – WAGSTAFF & CARTMELL

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-01614	Donna S. Bishop, John S. Bishop v. Johnson & Johnson, American Medical Systems, Inc., Ethicon, Inc.
2:12-CV-04251	Elnora Kyzer, Herbert Kyzer v. Johnson & Johnson, American Medical Systems, Inc., Ethicon, Inc.
2:13-CV-08972	Shana Leding, Patrick Leding v. American Medical Systems, Inc., Ethicon, Inc., Johnson & Johnson
2:14-CV-17402	Dorothy Shuter, William M. Shuter v. American Medical Systems, Inc., Boston Scientific Corporation, Ethicon, Inc., Johnson & Johnson
2:15-CV-16408	Janice King v. American Medical Systems, Inc., Ethicon, Inc., Johnson & Johnson
2:16-CV-02073	Mary Connolly v. American Medical Systems, Inc., Ethicon, Inc., Johnson & Johnson
2:16-CV-03234	Judy Tucker v. American Medical Systems, Inc., Ethicon, Inc., Johnson & Johnson
2:17-CV-02115	Virginia Dannaker v. American Medical Systems, Inc., Ethicon, Inc., Johnson & Johnson
2:17-CV-02349	Rose Biase v. Ethicon, Inc., Johnson & Johnson, American Medical Systems

EXHIBIT G – FLEMING NOLEN & JEZ

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-05686	Ninia D. Beatrice, Anthony Beatrice v. Johnson & Johnson, American Medical Systems, Inc., Ethicon, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis